



Alliant Energy Corporation
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Federal Communications Commission
445 12th Street SW
Washington, DC 20554

24 February 2003

RE: Alliant Energy Reply Comments on NPRM WT DOCKET NO. 02-55 – Improving
Public Safety Communications in the 800 MHz Band

To whom it may concern:

Alliant Energy is the parent company of Interstate Power and Light Company (IP&L) and Wisconsin Power and Light (WP&L). IP&L provides electric, gas and steam services in Iowa, Minnesota and Illinois. WP&L provides electric, gas and water utility services in Wisconsin. Both subsidiaries have significant operational and financial investments in their 800 MHz wide-area private radio systems, which are operated over more than 120 sites and covers over 75,000 square miles; most of it rural service territory.

In response to Commission's request for Reply Comments by February 25th, 2003, related to NPRM 02-55, this letter serves as Alliant Energy's Reply Comments further opposing the Private Wireless Coalition's (PWC) most recent Comments and previously proposed "Consensus Plan" proposal.

Alliant Energy further supports both the UTC/EEI and Motorola Comments filed February 10, 2003. Specifically Alliant Energy's reaffirms the key points they made as follows:

UTC/EEI

- The PWC Proposal is a privately negotiated contract that will face many legal challenges and should not be imposed on an entire frequency band.
- The PWC Proposal is contrary to existing and developing FCC spectrum policy related to 3G-type technology as recently released by the FCC Spectrum Policy Task Force.
- The Proposed Re-Banding Process would be overly complex and the proposed RCC overly powerful.
- Critical Infrastructure must not be forced into deficient spectrum, prevented from upgrading to more efficient technology or "encouraged" to move to the 900 MHz Band.
- The 800 MHz Band needs new technical rules immediately to resolve current and prevent future interference.
- The Consensus Plans' proposed treatment of SouthernLINC's system proves the soundness of UTC/EEI's recommendations and contradicts the PWC's own case for Rebanding.

Motorola

- The Proposed Freeze on B/ILT and SMR Systems is not necessary due to lack of remaining “white space” and it will impede the implementation of system improvements for licensees.
- The Consensus Plan’s proposed signal strength threshold’s for interference protection in the Guard Band will force licensees to build systems with reduced coverage radiuses; resulting in an increased number of sites and the need for additional frequencies.
- Existing systems that are not Class A receiver compliant should be grandfathered for interference protection.

In addition, Alliant Energy believes it is representative of many Utilities and, as such, reiterates the following common concerns:

- The PWC Plan and proposed re-banding to be an extreme, unnecessary and legally complicated regulatory effort that will create unnecessary interruption of service and heavy expense.
- The original problem in need of resolution is geographically isolated interference problems between high profile incumbents. Re-banding is NOT needed.
- Alliant respectfully requests the FCC mandate and enforce the use of best practices and technological solutions along with a market-based approach of frequency “trading” to resolve interference without involving other licensees.
- The FCC must provide measures to preserve the ability to meet current and future spectrum needs of Critical Infrastructure (CI), including Utilities.
- The PWC proposed band “freeze” and licensing process during re-banding are unrealistic and will cause extreme backlogs and delays for even for parties not relocating.
- Enacting the PWC Plan will compromise many Utility’s 800 MHz system operations and risk the health and safety of Utility workers and customers alike.

Alliant Energy respectfully submits these Reply Comments for the Commission’s consideration. If you have any questions, please contact me at the phone number and address listed below.

Thank you for your time and consideration in this matter.

Sincerely,

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